Before the Federal Communications Commission Washington , D.C. 20554

In the Matter of Numbering Resource)	CC Docket No. 99-200
Optimization)	

VERMONT PUBLIC SERVICE BOARD'S COMMENTS ON THE NATIONAL THOUSANDS-BLOCK NUMBER POOLING ROLLOUT SCHEDULE

The Vermont Public Service Board (VTPSB) supports the Federal Communications Commission's (FCC) proposed national thousands-block number pooling rollout schedule (rollout schedule). The VTPSB also wishes to extend its thanks for the obviously thoughtful consideration and hard work that went into preparing the proposed rollout schedule.

The proposed rollout schedule by providing an orderly schedule of pooling in approximately 21 Numbering Plan Areas (NPAs) per quarter will eventually result in a smooth transition to nationwide thousands-block pooling. The transition of the existing number pools already underway in various states into the proposed rollout schedule should also provide more certainty to states and the telecommunications industry through an orderly and cohesive national approach to number conservation. In addition, the VTPSB recommends that the proposed rollout schedule should not be greatly altered because many states, including Vermont, are implementing pooling in conjunction with the proposed schedule in the very near future. Changes to the proposed rollout schedule at this juncture would result in inefficiencies and costly delays to these states' pooling efforts.

Similarly, pooling cost recovery on a national basis, pursuant to Paragraphs 192-215 of FCC's *Report and Order*¹, should avoid the costly inefficiency of instituting cost recovery mechanisms in each state on an individual basis. The FCC in its Report and Order concludes that the shared industry costs of thousands-block pooling "should be recovered from all classes

^{1.} *In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 00-104 (March 17, 2000) ("Report and Order").

of telecommunications carriers according to the NANPA formula." The FCC also concludes, with respect to carrier-specific costs directly related to thousands-block pooling, that "requiring carriers to bear and recover their own carrier-specific costs is consistent with the competitive neutrality requirements in section 251(e)(2). The VTPSB agrees with the FCC that the costs associated with national thousands-block pooling be recovered at the national level. The FCC should further clarify that the costs associated with the proposed national pooling rollout, which includes Vermont's 802 NPA, shall be recovered through a national cost recovery mechanism.

The proposed rollout schedule provides individual states with an appropriate level of scheduling flexibility for this transition. By continuing to consider petitions of states outside the top 100 MSAs and those states which not yet received delegated authority to opt into the schedule, and by allowing states to substitute alternative NPAs for those already included in the schedule, the FCC has ensured that the proposed rollout schedule will allow states the flexibility they need to operate within the schedule. Similarly, the FCC should allow the industry flexibility, to the extent that this does not interfere with other states' pooling efforts, to modify the accelerated pooling rollout schedule if necessary. This type of flexibility should avoid any need for wholesale changes to the proposed rollout schedule.

Respectfully submitted this	day of	, 2001.
By:		
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^{2.} *Id.* at ¶ 207.

^{3.} Id. at ¶ 209.